

**BRAFMAN & ASSOCIATES, P.C.**

ATTORNEYS AT LAW

256 FIFTH AVENUE, 2ND FLOOR

NEW YORK, NEW YORK 10001

TELEPHONE: (212) 750-7800

FACSIMILE: (212) 750-3906

E-MAIL: ATTORNEYS@BRAFLAW.COM

BENJAMIN BRAFMAN

MARK M. BAKER  
OF COUNSEL

MARC A. AGNIFILO  
OF COUNSEL

ZACH INTRATER  
OF COUNSEL

ANDREA L. ZELLAN

JACOB KAPLAN  
ADMITTED IN NY & NJ

TENY R. GERAGOS  
ADMITTED IN NY & CA

October 10, 2023

**VIA ECF**

The Honorable Kiyo A. Matsumoto  
United States District Judge  
United States District Courthouse  
225 Cadman Plaza East  
Brooklyn, NY 11201

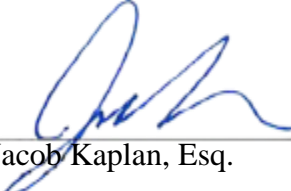
Re: *United States v. Quanzhong An*, 22 Cr. 460 (KAM)

Dear Judge Matsumoto:

On May 25, 2023, Magistrate Judge James R. Cho released Quanzhong An to home incarceration and electronic monitoring. We write now—without objection from the government or Pretrial Services—requesting a modification of Mr. An's release conditions to allow him to drive his children to school in the mornings. Specifically, Mr. An would leave his house at 8:00 a.m. and return at 8:40 a.m.

Thank you for your consideration.

Respectfully,



Jacob Kaplan, Esq.

cc: Government Counsel (via ECF)  
Pretrial Services Officer Corinne Carroll (via email)